

## **EXHIBIT A**

# **PARTIES' JOINT CLAIM CONSTRUCTION CHART**

## **FOR FAMILY 9 PATENTS**

<b>Disputed Claim Term</b>	<b>Patent, Asserted Claims</b>	<b>Plaintiff's Proposed Construction</b>	<b>Defendants' Proposed Construction</b>
“the [shared] memory”	'956 patent, claim 28, 31  '546 patent, claim 1  '784 patent, claim 1, 7	“common memory space used by at least two functions, where particular memory cells within the common memory space can be used by either one of the functions”  <u>Intrinsic Evidence:</u>  '956 patent, Fig. 1 (250 and 350), 2:10-12, 18:6-10, 18:23-31, 18:60-65, 22:11-24.	“single common memory in a transceiver used by a retransmission function and at least one other function”  <u>Intrinsic Evidence:</u>  '956 patent, Col. 2:16-27, 2:48-55, 3:47-52, 3:59-61, 5:33-35, 9:61-10:11, 18:6-31, 18:66-19:25, 21:63-22:11, 22:15-24; Figs. 1, 4-5; <i>see also</i> Asserted claims
“amount of [the] [shared] memory”	'956 patent, claim 28, 31  '546 patent, claim 1	plain meaning or “number of units of memory”  <u>Intrinsic Evidence:</u>  '956 patent, 18:63, 19:18-20.	“number of bytes of [the shared] memory”  <u>Intrinsic Evidence:</u>  <u>'956 patent, Col. 16:58-67, 17:1-44, 17:46-53, 19:8-19, 19:30-56 , 20:28-47</u>
“how much of the [shared] memory”	'546 patent, claim 1	plain meaning or “number of units of memory”  <u>Intrinsic Evidence:</u>  '956 patent, 18:66-19:19, 19:20-25.	“number of bytes of [the shared] memory”  <u>Intrinsic Evidence:</u>  <u>'956 patent, Col. 16:58-67, 17:1-44, 17:46-53, 19:8-19, 19:30-56 , 20:28-47</u>
“portion of the	'956 patent, claim 28,	This term should not be construed out of context. See below for proposed	“numbers of bytes within the [shared]

Disputed Claim Term	Patent, Asserted Claims	Plaintiff's Proposed Construction	Defendants' Proposed Construction
[shared] memory”	31  ’546 patent, claim1  ’411 patent, claim 10, 18	construction in context.  <u>Intrinsic Evidence:</u>	memory”  <u>Intrinsic Evidence:</u>  ’956 patent, Col. 16:58-67, 17:1-44, 17:46-53, 18:21-31, 19:8-19, 19:30-56, 20:28-47
“allocating a [first / second] portion of the shared memory to the [deinterleaving / packet retransmission] function”	’956 patent, claim 28, 31  ’546 patent, claim 1	plain meaning or “allocating a [first / second] set of memory locations within the shared memory to the [deinterleaving / packet retransmission] function”  <u>Intrinsic Evidence:</u>  ’956 patent, 18:4-31, 18:60-65, 18:66-19:19.	“allocating a [first / second] number of bytes within the shared memory to the [deinterleaving / packet retransmission] function for use in either the upstream or downstream directions”  <u>Intrinsic Evidence:</u>  ’956 patent, Col. 18:6-31, 18:66-19:25, 20:28-47, 20:62-67, 21:59-22:2, 22:7-8
“allocating a memory between a retransmission function and an interleaving and/or deinterleaving function”	’411 patent, claim 10, 18	plain meaning or “allocating a first set of memory locations within the shared memory to the retransmission function and allocating a second set of memory locations within the shared memory to an interleaving function and/or deinterleaving function”  <u>Intrinsic Evidence:</u>  ’956 patent, 18:4-31, 18:60-65, 18:66-19:19.	“allocating a [first / second] number of bytes within the shared memory to the [interleaving and/or deinterleaving / packet retransmission] function for use <u>in either the upstream or downstream with a single stream directions</u> ”  <u>Intrinsic Evidence:</u>  ’956 patent, Col. 18:6-31, 18:66-19:25, 20:28-47, 20:62-67, 21:59-22:2, 22:7-8
“memory [] is to be allocated to the packet retransmission	’784 patent, claim 1, 7	plain meaning or “a first set of memory locations within the shared memory are to be allocated to the retransmission	“allocating a [first / second] number of bytes within the shared memory to the [interleaving and/or deinterleaving /

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function and to the one or more of interleaving [or/and] deinterleaving functions”		<p>function and a second set of memory locations within the shared memory are to be allocated to an interleaving function [and/or] deinterleaving function”</p> <p><u>Intrinsic Evidence:</u> '956 patent, 18:4-31, 18:60-65, 18:66-19:19.</p>	<p>packet retransmission] function for use <u>in either the upstream or down</u>with a single stream <u>directions</u>”</p> <p><u>Intrinsic Evidence:</u> '956 patent, Col. 18:6-31, 18:66-19:25, 20:28-47, 20:62-67, 21:59-22:2, 22:7-8</p>
“wherein a message transmitted during initialization indicates how the memory has been allocated between the retransmission function and the interleaving and/or deinterleaving function”	'411 patent, claim 10	<p>plain meaning or “wherein a message transmitted during initialization indicates the amount of memory that has been allocated to the retransmission function and the amount of memory that has been allocated to the interleaving and/or deinterleaving function”</p> <p><u>Intrinsic Evidence:</u> '956 patent, 18:66-19:19, 19:20-25, 19:30-55, 21:60-63</p>	<p>“wherein a message transmitted by the transceiver during initialization indicates a number of bytes of memory allocated to the retransmission function and the interleaving and/or deinterleaving function”</p> <p><u>Intrinsic Evidence:</u> '956 patent, Col. 18:6-31, 18:66-19:25, 21:55-22:8</p>
“wherein at least a portion of the memory may be allocated to the retransmission function or to the interleaving and/or deinterleaving function at anyone particular time”	'411 patent, claim 10	<p>“wherein in at least some particular [memory cells / memory locations] within the memory can be allocated for use by either the retransmission function or the interleaving and/or deinterleaving function at any one particular time”</p> <p><u>Intrinsic Evidence:</u> '956 patent, 18:4-31, 18:60-65, 18:66-</p>	<p>“wherein at least a number of bytes within the memory may be allocated to the retransmission function or to the interleaving and/or deinterleaving function at any one particular time”</p> <p><u>Intrinsic Evidence:</u> '956 patent, Col. 18:6-31, 18:66-19:25, 21:55-22:8</p>

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		19:19.	
“wherein at least a portion of the memory may be allocated between the retransmission function and the interleaving and/or deinterleaving function at any one particular time depending on the message”	'411 patent, claim 18	<p>“wherein in at least some particular [memory cells / memory locations] within the memory can be allocated for use by either the retransmission function or the interleaving and/or deinterleaving function at any one particular time depending on the message”</p> <p><u>Intrinsic Evidence:</u></p> <p>'956 patent, 18:66-19:19, 19:20-25, 19:30-55, 21:60-63</p>	<p>“wherein at least a number of bytes within the memory may be allocated to the retransmission function or to the interleaving and/or deinterleaving function at any one particular time depending on the amount of memory specified in the message”</p> <p><u>Intrinsic Evidence:</u></p> <p>'956 patent, Col. 18:6-31, 18:66-19:25, 21:55-22:8</p>

<b>Claim term</b>	<b>Claim</b>	<b>Agreed to construction</b>
“transceiver”	'956 patent, claim 28, 31 '546 patent, claim 1 '411 patent, claim 10, 18 '784 patent, claim 1, 7 '577 patent, claim 30, 53	The parties agree to be bound by the Court’s construction of “transceiver” in Family 1. <sup>12</sup>
“packet”	'411 patent, claim 10, 18 '577 patent, claim 30, 53	“a grouping of bytes”
“multicarrier”	'577 patent, claim 30, 53	“having multiple carrier signals that are combined to produce a transmission signal”

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<sup>1</sup> Defendants have proposed that “transceiver” should be construed as “communications device capable of transmitting and receiving data” based on at least the following intrinsic evidence: *see, e.g.*, '956 patent at 9:49-57, 20:62-65. Defendants agree to be bound by the Court’s construction of “transceiver” in Family 1 for purposes of streamlining the case. Defendants reserve the right to challenge the Court’s construction of “transceiver” on appeal as to all Families 1-10.

<sup>2</sup> Plaintiff has proposed that “transceiver” should be construed to mean “communications device capable of transmitting and receiving data wherein the transmitter portion and receiver portion share at least some common circuitry” based on at least the following intrinsic evidence: *see, e.g.*, '956 patent, Fig. 1, 4:4-13, 9:60-10:12. Plaintiff agrees that the Court’s construction of “transceiver” in the Family 1 Patents applies to “transceiver” as used in the Family 7 Patents. Plaintiff reserves the right to challenge the Court’s construction of “transceiver” on appeal as to all Families 1-10.